

Exhibit A

No. 25-4476

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

In re Donald J. Trump, et al.,
Petitioners-Defendants.

v.

United States District Court of the Northern District of California,
Respondent,

American Federation of Government Employees, AFL-CIO, et al.,
Real Parties in Interest-Plaintiffs.

ON PETITION FOR WRIT OF MANDAMUS TO THE UNITED STATES
DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

No. 3:25-cv-03698-SI

The Honorable Judge Susan Illston

**REAL PARTIES IN INTEREST-PLAINTIFFS'
SURREPLY RE: PETITIONERS-DEFENDANTS' PROPOSAL TO
IMPROPERLY EXPAND MANDAMUS PETITION**

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Real Party in Interest-Plaintiffs provide this short initial response to the new arguments raised by Petitioner-Defendants' Reply Brief filed today, in which they propose that the Court expand the pending Petition for a Writ of Mandamus to include a different, additional order of the District Court that that is not before this Court. Dkt. 12.1 at 13-16. Respondents-Plaintiffs have not had the opportunity or time to evaluate and respond to the merits of Petitioners-Defendants' new arguments, but provide this response to clarify the untimeliness and impropriety of this attempt to expand the scope of this matter.

The pending Mandamus Petition concerns a July 18, 2025 order from the District Court requiring production of the Agency RIF and Reorganization Plans at issue in this litigation. In the Reply, filed today August 8, 2025, Petitioners-Defendants request for the first time that this Petition be expanded to provide additional relief with respect to a different order of the District Court, dated July 25, 2025. Petitioners-Defendants have, without any good cause or explanation, waited *two weeks* since the District Court issued that order (having never sought any stay below) before attempting to include this order in these mandamus proceedings by way of their reply brief. Plaintiffs object to this inappropriate use of a reply brief, as well as Petitioners-Defendants' untimely attempt to supplement their Petition or have the Court treat their reply brief as a new Petition, and respectfully request that, when this Court considers the merits of the pending

Petition, this attempt to supplement the matter before the Court be summarily denied as procedurally improper.

DATED: August 8, 2025

Respectfully submitted,

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FILER'S ATTESTATION

Pursuant to Circuit Rule 25-5(f), the filer attests that all other signatories to this document concur in the content of, and have authorized, this filing.

Dated: August 8, 2025

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